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Andrew T. Solomon
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Via ECF

Hon. Alison J. Nathan, U.S.D.J.
Thurgood Marshall,
United States Courthouse
40 Foley Square, Courtroom 906
New York, NY 10007

Re: *City of Almaty v Ablyazov*, 1:15-CV-5345 (AJN)

Dear Judge Nathan:

This firm represents defendants Viktor Khrapunov and Ilyas Khrapunov. Today, Viktor Khrapunov filed his renewed motion to dismiss Plaintiffs' Second Amended Crossclaims on personal jurisdiction grounds. In support of the motion, we attached brief excerpts from the deposition testimony of Plaintiffs' 30(b)(6) witnesses. We filed the excerpts and the testimony under seal and redacted because Plaintiffs have designated the entire transcript as confidential.

We file under seal and with redactions under protest. We presented the materials to Plaintiffs' counsel in advance of the motion, asking them to confirm that the excerpts did not contain confidential information. Counsel refused to agree. We then asked for the basis for the assertion of confidentiality, and counsel, predictably, cited the catchall category set out in paragraph 3(e) of the Protective Order [ECF 235] ("Any other sensitive non-public information").

No extended discussion is required. Plaintiffs' designation of confidentiality as to the deposition testimony excerpts is improper. The Court should reject our filing under seal and order us to file unredacted copies into the public record.

Respectfully yours,

/s/Andrew T. Solomon

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